

FACT SHEET FOR STATE WASTE DISCHARGE PERMIT ST 6078
BBA NONWOVENS INC.

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INTRODUCTION

This fact sheet is a companion document to the draft State Waste Discharge Permit No. ST 6078. The Department of Ecology (the Department) is proposing to issue this permit, which will allow discharge of wastewater to the Washougal POTW. This fact sheet explains the nature of the proposed discharge, the Department's decisions on limiting the pollutants in the wastewater, and the regulatory and technical bases for those decisions.

Washington State law (RCW 90.48.080 and 90.48.160) requires that a permit be issued before discharge of wastewater to waters of the state is allowed. This statute includes commercial or industrial discharges to sewerage systems operated by municipalities or public entities which discharge into public waters of the state. Regulations adopted by the state include procedures for issuing permits and establish requirements which are to be included in the permit (Chapter 173-216 WAC).

This fact sheet and draft permit are available for review by interested persons as described in Appendix A—Public Involvement Information.

The fact sheet and draft permit have been reviewed by the Permittee. Errors and omissions identified in these reviews have been corrected before going to public notice. After the public comment period has closed, the Department will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file on the permit and parties submitting comments will receive a copy of the Department's response. The fact sheet will not be revised. Changes to the permit will be addressed in Appendix D—Response to Comments.

GENERAL INFORMATION	
Applicant	BBA Nonwovens, Inc.
Facility Name and Address	3720 Grant Street Washougal, WA 98671
Type of Facility	Textile Manufacturer, Nonwoven
Facility Discharge Location	<u>Outfall 002, Washougal City Sewer</u> Latitude: 45° 33' 49" Longitude: 122° 19' 45"
Treatment Plant Receiving Discharge	City of Washougal
Contact at Facility	Name: Ronald K. Kramer SPHR Telephone #: (360) 835-8787 Ext. 507
Responsible Official	Name: Dave Ellenz, Title: Plant Manager Address: 3720 Grant Street, Washougal, WA 98671 Telephone #: (360) 835-8787 Ext. 578 FAX # (360) 835-2546

BACKGROUND INFORMATION

DESCRIPTION OF THE FACILITY

This facility manufactures nonwoven fabrics from synthetic polymers. This facility is ranked as a Significant Industrial User due to the non-cooling water discharge of process water at 34,290 gpd. See Appendix C. It is subject to categorical pretreatment standards.

HISTORY

This facility was built in 1982 and has operated continuously since. The first permit for this facility was issued in 1992.

INDUSTRIAL PROCESSES

This plant manufactures nonwoven polymer fabrics for use in hygiene, medical and upholstery. Polymer pellets are brought in by rail, melted, extruded into filaments which are bonded together into rolls of fabric. A surfactant is sprayed on the fabric used for diapers to provide absorbency. Production of the following products in 2001 in metric tons was Spun-Bond, 15099.5, SMS 1079.2, BICO 1592.6 for a total of 17771.2 metric tons. Polymers used are polyethylene, polypropylene, polyester, and nylon.

Raw material usage: *See Appendix C*

This facility operates 24 hours per day, seven days per week, 52 weeks per year.

Miscellaneous chemicals stored on site: *See Appendix C*

The primary treatment chemical is Watercare product #2312 corrosion inhibitor for the cooling towers. The active chemicals in Watercare product #2312 are potassium hydroxide, hydroethylenediphosphonic acid, sodium polyacrylate (4500 MW), sodium mercaptobenzothiazole and sodium lignosulphate. 24,678 pounds of this product were used in 2001. Five pounds of Quaternary Amine are used annually to treat the plant's evaporative space coolers.

Outfall 002 (Washougal Sanitary Sewer) combines noncontact cooling water (15,000 GPD), sanitary waste water (7750 GPD), smoke removal scrubber water (7300 GPD), foam generator cooling water (5220 GPD), quench air handling unit drains (6805 GPD), equipment washing and steam cleaning water (565 GPD), and EREMA pellet drying makeup water (14400 GPD), for a total average daily discharge of 49290 GPD.

This is a permit renewal.

TREATMENT PROCESSES

No treatment is proposed to be applied to these waste streams. The non-contact cooling water stream is presently being chilled with refrigeration so that temperature limits for discharge to waters of the state can be met. This permit application proposes to combine the Outfall 001 discharge (cooling water) from the present permit with the process water currently discharged to the Washougal sewer. Outfall 001 will be abandoned. Refrigerated wastewater cooling will be eliminated from the process. This act will require transfer of the permit from NPDES jurisdiction to state jurisdiction

PERMIT STATUS

The previous permit for this facility was issued on November 4, 1997.

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An application for NPDES permit renewal was submitted to the Department on March 1, 2002. An amended application was submitted on August 21, 2002, and accepted by the Department on September 11, 2002. An NPDES application was accepted for a state permit given that the information required was sufficient.

SUMMARY OF COMPLIANCE WITH THE PREVIOUS PERMIT

The facility last received an inspection on July 24, 2002.

During the history of the previous permit, the Permittee has not remained in compliance based on Discharge Monitoring Reports (DMRs) and other reports submitted to the Department and inspections conducted by the Department. The permittee has had four (4) exceedances of temperature limits during the term of the existing permit, all in 2001.

WASTEWATER CHARACTERIZATION

The concentration of pollutants in the discharge was reported in the permit application and in discharge monitoring reports. The proposed wastewater discharge is characterized for the following parameters: *See Appendix C.*

PROPOSED PERMIT LIMITATIONS

State regulations require that limitations set forth in a waste discharge permit must be based on the technology available to treat the pollutants (technology-based) or be based on the effects of the pollutants to the POTW (local limits). Wastewater must be treated using all known, available, and reasonable treatment (AKART) and not interfere with the operation of the POTW.

The more stringent of the local limits-based or technology-based limits are applied to each of the parameters of concern. Each of these types of limits is described in more detail below.

TECHNOLOGY-BASED EFFLUENT LIMITATIONS

All waste discharge permits issued by the Department must specify conditions requiring available and reasonable methods of prevention, control, and treatment of discharges to waters of the state (WAC 173-216-110). Existing federal categorical limitations for this facility are found under 40 CFR Part 403. The following permit limitations are necessary to satisfy the requirement for AKART: Meet the standards set by the receiving agency.

EFFLUENT LIMITATIONS BASED ON LOCAL LIMITS

In order to protect the Washougal wastewater treatment plant from pass-through, interference, concentrations of toxic chemicals that would impair beneficial or designated uses of sludge, or potentially hazardous exposure levels, limitations for certain parameters are necessary. These limitations are based on local limits established by the City of Washougal and codified in ordinance. Applicable limits for this discharge include the following:

Parameter	Limit
Biochemical Oxygen Demand, 5 day	300 mg/l
Total Suspended Solids	300 mg/l
Oil and Grease	100 mg/l
Temperature	40° C
pH	6 to 9 S.U.

Pollutant concentrations in the proposed discharge with technology-based controls in place will not cause problems at the receiving POTW such as interference, pass-through or hazardous exposure to POTW workers nor will it result in unacceptable pollutant levels in the POTW's sludge.

COMPARISON OF LIMITATIONS WITH THE EXISTING PERMIT ISSUED NOVEMBER 4, 1997

With the exception of temperature, the limits in this permit are identical to the limits set in the existing permit for Outfall 002. Outfall 001 has been eliminated.

MONITORING REQUIREMENTS

Monitoring, recording, and reporting are specified to verify that the treatment process is functioning correctly, and that effluent limitations are being achieved (WAC 173-216-110).

The monitoring schedule is detailed in the proposed permit under Condition S2. Specified monitoring frequencies take into account the quantity and variability of the discharge, the treatment method, past compliance, significance of pollutants, and cost of monitoring.

The monitoring frequency has been reviewed to see if it is possible, using department policy, to reduce monitoring frequency. The average concentration of each parameter has been derived and is shown in Appendix C. The concentration of temperature for both Outfalls 001 and 002 have been computed using a flow-weighted average. The average concentration for oil and grease, total suspended solids, and biochemical oxygen demand has been averaged for Outfall 002 alone since Outfall 001 showed no appreciable discharges of oil and grease.

MONITORING FREQUENCY CALCULATION

Parameter	Avg. Conc.	Limit	Ratio, Conc. To limit	Present Frequency	Proposed Frequency.
Temperature	26	65.5	.40	Continuous	Continuous. Report Monthly
O & G	5	100	.05	Quarterly	Twice per year
BOD	67	300	.22	Quarterly	Twice per year
TSS	53	300	.18	Quarterly	Twice per year

Monitoring for flow is being required to further characterize the effluent. This pollutant could have a significant impact on the receiving POTW.

OTHER PERMIT CONDITIONS

REPORTING AND RECORDKEEPING

The conditions of S3 are based on the authority to specify any appropriate reporting and recordkeeping requirements to prevent and control waste discharges (WAC 273-216-110 and 40 CFR 403.12 (e),(g), and (h)).

OPERATIONS AND MAINTENANCE

The proposed permit contains condition S.5. as authorized under Chapter 173-240-150 WAC and Chapter 173-216-110 WAC. It is included to ensure proper operation and regular maintenance of equipment, and to ensure that adequate safeguards are taken so that constructed facilities are used to their optimum potential in terms of pollutant capture and treatment.

PROHIBITED DISCHARGES

Certain pollutants are prohibited from being discharged to the POTW. These include substances which cause pass-through or interference, pollutants which may cause damage to the POTW or harm to the POTW workers (Chapter 173-216 WAC) and the discharge of designated dangerous wastes not authorized by this permit (Chapter 173-303 WAC).

DILUTION PROHIBITED

The Permittee is prohibited from diluting its effluent as a partial or complete substitute for adequate treatment to achieve compliance with permit limitations.

NON-ROUTINE AND UNANTICIPATED DISCHARGES

Occasionally, this facility may generate wastewater which is not characterized in their permit application because it is not a routine discharge and was not anticipated at the time of application. These typically are waters used to pressure test storage tanks or fire water systems or leaks from drinking water systems. These are typically clean waste waters but may be contaminated with pollutants. The permit contains an authorization for non-routine and unanticipated discharges. The permit requires a characterization of these waste waters for pollutants and examination of the opportunities for reuse. Depending on the nature and extent of pollutants in this wastewater and opportunities for reuse, Ecology may authorize a direct discharge via the process wastewater outfall or through a stormwater outfall for clean water, require the wastewater to be placed through the facilities wastewater treatment process or require the water to be reused.

SPILL PLAN

The Permittee has developed a plan for preventing the accidental release of pollutants to state waters and for minimizing damages if such a spill occurs. The proposed permit requires the Permittee to update this plan and submit it to the Department.

COMPLIANCE SCHEDULE FOR MEETING PRETREATMENT STANDARDS

The permittee shall have completed the cooling tower effluent connection to Outfall 002 prior to September 30, 2003.

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GENERAL CONDITIONS

General Conditions are based directly on state laws and regulations and have been standardized for all industrial waste discharge to POTW permits issued by the Department.

Condition G1 requires responsible officials or their designated representatives to sign submittals to the Department. Condition G2 requires the Permittee to allow the Department to access the treatment system, production facility, and records related to the permit. Condition G3 specifies conditions for modifying, suspending or terminating the permit. Condition G4 requires the Permittee to apply to the Department prior to increasing or varying the discharge from the levels stated in the permit application. Condition G5 requires the Permittee to construct, modify, and operate the permitted facility in accordance with approved engineering documents. Condition G6 prohibits the Permittee from using the permit as a basis for violating any laws, statutes or regulations. Conditions G7 and G8 relate to permit renewal and transfer. Condition G9 requires the Permittee to control production or wastewater discharge in order to maintain compliance with the permit. Condition G10 prohibits the reintroduction of removed pollutants into the effluent stream for discharge. Condition G11 requires the payment of permit fees. Condition G12 describes the penalties for violating permit conditions.

PUBLIC NOTIFICATION OF NONCOMPLIANCE

A list of all industrial users which were in significant noncompliance with Pretreatment Standards or Requirements during any of the previous four quarters may be annually published by the Department in a local newspaper. Accordingly, the Permittee is apprised that noncompliance with this permit may result in publication of the noncompliance.

RECOMMENDATION FOR PERMIT ISSUANCE

This proposed permit meets all statutory requirements for authorizing a wastewater discharge, including those limitations and conditions believed necessary to control toxics. The Department proposes that the permit be issued for 5 years.

APPENDICES

APPENDIX A—PUBLIC INVOLVEMENT INFORMATION

The Department has tentatively determined to reissue a permit to the applicant listed on page 1 of this fact sheet. The permit contains conditions and effluent limitations which are described in the rest of this fact sheet.

Public notice of application was published on July 14, 2002 and July 21, 2002 in *The Columbian* to inform the public that an application had been submitted and to invite comment on the reissuance of this permit.

The Department will publish a Public Notice of Draft (PNOD) on January 14, 2003, in the *Camas-Washougal Post* to inform the public that a draft permit and fact sheet are available for review. Interested persons are invited to submit written comments regarding the draft permit. The draft permit, fact sheet, and related documents are available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the regional office listed below. Written comments should be mailed to:

Industrial Unit Permit Coordinator
Department of Ecology
Southwest Region – Water Quality
P.O. Box 47775
Olympia, WA 98504-7775

Any interested party may comment on the draft permit or request a public hearing on this draft permit within the thirty (30) day comment period to the address above. The request for a hearing shall indicate the interest of the party and reasons why the hearing is warranted. The Department will hold a hearing if it determines there is a significant public interest in the draft permit (WAC 173-216-100). Public notice regarding any hearing will be circulated at least thirty (30) days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing.

Comments should reference specific text followed by proposed modification or concern when possible. Comments may address technical issues, accuracy and completeness of information, the scope of the facility's proposed coverage, adequacy of environmental protection, permit conditions, or any other concern that would result from issuance of this permit.

The Department will consider all comments received within thirty (30) days from the date of public notice of draft indicated above, in formulating a final determination to issue, revise, or deny the permit. The Department's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from the Department by telephone, (360) 407-6285 or writing to the address listed above.

This permit was written by Gary Anderson, P.E.

APPENDIX B—GLOSSARY

Ammonia—Ammonia is produced by the breakdown of nitrogenous materials in wastewater. Ammonia is toxic to aquatic organisms, exerts an oxygen demand, and contributes to eutrophication. It also increases the amount of chlorine needed to disinfect wastewater.

Average Monthly Discharge Limitation—The average of the measured values obtained over a calendar month's time.

Best Management Practices (BMPs)--Schedules of activities, prohibitions of practices, maintenance procedures, and other physical, structural and/or managerial practices to prevent or reduce the pollution of waters of the State. BMPs include treatment systems, operating procedures, and practices to control: plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage. BMPs may be further categorized as operational, source control, erosion and sediment control, and treatment BMPs.

BOD₅--Determining the Biochemical Oxygen Demand of an effluent is an indirect way of measuring the quantity of organic material present in an effluent that is utilized by bacteria. The BOD₅ is used in modeling to measure the reduction of dissolved oxygen in a receiving water after effluent is discharged. Stress caused by reduced dissolved oxygen levels makes organisms less competitive and less able to sustain their species in the aquatic environment. Although BOD is not a specific compound, it is defined as a conventional pollutant under the federal Clean Water Act.

Bypass—The intentional diversion of waste streams from any portion of the collection or treatment facility.

Categorical Pretreatment Standards—National pretreatment standards specifying quantities or concentrations of pollutants or pollutant properties which may be discharged to a POTW by existing or new industrial users in specific industrial subcategories.

Compliance Inspection - Without Sampling--A site visit for the purpose of determining the compliance of a facility with the terms and conditions of its permit or with applicable statutes and regulations.

Compliance Inspection - With Sampling--A site visit to accomplish the purpose of a Compliance Inspection - Without Sampling and as a minimum, sampling and analysis for all parameters with limits in the permit to ascertain compliance with those limits; and, for municipal facilities, sampling of influent to ascertain compliance with the 85 percent removal requirement. Additional sampling may be conducted.

Composite Sample—A mixture of grab samples collected at the same sampling point at different times, formed either by continuous sampling or by mixing discrete samples. May be "time-composite"(collected at constant time intervals) or "flow-proportional" (collected either as a constant sample volume at time intervals proportional to stream flow, or collected by increasing the volume of each aliquot as the flow increased while maintaining a constant time interval between the aliquots.

Construction Activity—Clearing, grading, excavation and any other activity which disturbs the surface of the land. Such activities may include road building, construction of residential houses, office buildings, or industrial buildings, and demolition activity.

Continuous Monitoring --Uninterrupted, unless otherwise noted in the permit.

Engineering Report—A document, signed by a professional licensed engineer, which thoroughly examines the engineering and administrative aspects of a particular domestic or industrial wastewater

facility. The report shall contain the appropriate information required in WAC 173-240-060 or 173-240-130.

Grab Sample—A single sample or measurement taken at a specific time or over as short period of time as is feasible.

Industrial User—A discharger of wastewater to the sanitary sewer which is not sanitary wastewater or is not equivalent to sanitary wastewater in character.

Industrial Wastewater—Water or liquid-carried waste from industrial or commercial processes, as distinct from domestic wastewater. These wastes may result from any process or activity of industry, manufacture, trade or business, from the development of any natural resource, or from animal operations such as feed lots, poultry houses, or dairies. The term includes contaminated storm water and, also, leachate from solid waste facilities.

Interference— A discharge which, alone or in conjunction with a discharge or discharges from other sources, both:

Inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use or disposal and;

Therefore is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with the following statutory provisions and regulations or permits issued thereunder (or more stringent State or local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) (including title II, more commonly referred to as the Resource Conservation and Recovery Act (RCRA), and including State regulations contained in any State sludge management plan prepared pursuant to subtitle D of the SWDA), sludge regulations appearing in 40 CFR Part 507, the Clean Air Act, the Toxic Substances Control Act, and the Marine Protection, Research and Sanctuaries Act.

Local Limits—Specific prohibitions or limits on pollutants or pollutant parameters developed by a POTW.

Maximum Daily Discharge Limitation—The highest allowable daily discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. The daily discharge is calculated as the average measurement of the pollutant over the day.

Method Detection Level (MDL)--The minimum concentration of a substance that can be measured and reported with 99% confidence that the analyte concentration is above zero and is determined from analysis of a sample in a given matrix containing the analyte.

Pass-through— A discharge which exits the POTW into waters of the-State in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation), or which is a cause of a violation of State water quality standards.

pH—The pH of a liquid measures its acidity or alkalinity. A pH of 7 is defined as neutral, and large variations above or below this value are considered harmful to most aquatic life.

Potential Significant Industrial User--A potential significant industrial user is defined as an Industrial User which does not meet the criteria for a Significant Industrial User, but which discharges wastewater meeting one or more of the following criteria:

- a. Exceeds 0.5 % of treatment plant design capacity criteria and discharges <25,000 gallons per day or;

- b. Is a member of a group of similar industrial users which, taken together, have the potential to cause pass through or interference at the POTW (e.g. facilities which develop photographic film or paper, and car washes).

The Department may determine that a discharger initially classified as a potential significant industrial user should be managed as a significant industrial user.

Quantitation Level (QL)-- A calculated value five times the MDL (method detection level).

Significant Industrial User (SIU)--

- 1) All industrial users subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR Chapter I, Subchapter N and;
- 2) Any other industrial user that: discharges an average of 25,000 gallons per day or more of process wastewater to the POTW (excluding sanitary, noncontact cooling, and boiler blow-down wastewater); contributes a process wastestream that makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant; or is designated as such by the Control Authority* on the basis that the industrial user has a reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement (in accordance with 40 CFR 403.8(f)(6)).

Upon finding that the industrial user meeting the criteria in paragraph 2, above, has no reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement, the Control Authority* may at any time, on its own initiative or in response to a petition received from an industrial user or POTW, and in accordance with 40 CFR 403.8(f)(6), determine that such industrial user is not a significant industrial user.

*The term "Control Authority" refers to the Washington State Department of Ecology in the case of non-delegated POTWs or to the POTW in the case of delegated POTWs.

Slug Discharge—Any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch discharge to the POTW. This may include any pollutant released at a flow rate which may cause interference with the POTW.

State Waters—Lakes, rivers, ponds, streams, inland waters, underground waters, salt waters, and all other surface waters and watercourses within the jurisdiction of the state of Washington.

Stormwater—That portion of precipitation that does not naturally percolate into the ground or evaporate, but flows via overland flow, interflow, pipes, and other features of a storm water drainage system into a defined surface water body, or a constructed infiltration facility.

Technology-based Effluent Limit—A permit limit that is based on the ability of a treatment method to reduce the pollutant.

Total Coliform Bacteria—A microbiological test which detects and enumerates the total coliform group of bacteria in water samples.

Total Dissolved Solids—That portion of total solids in water or wastewater that passes through a specific filter.

Total Suspended Solids (TSS)--Total suspended solids is the particulate material in an effluent. Large quantities of TSS discharged to a receiving water may result in solids accumulation. Apart from any toxic effects attributable to substances leached out by water, suspended solids may kill fish, shellfish, and other aquatic organisms by causing abrasive injuries and by clogging the gills and respiratory passages of

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various aquatic fauna. Indirectly, suspended solids can screen out light and can promote and maintain the development of noxious conditions through oxygen depletion.

Water Quality-based Effluent Limit—A limit on the concentration of an effluent parameter that is intended to prevent the concentration of that parameter from exceeding its water quality criterion after it is discharged into a receiving water.

APPENDIX C—MISCELLANEOUS TABLES AND CALCULATIONS

- Raw material usage by line by month.
- Miscellaneous chemicals stored on site.
- Wastewater characterizations Page 1.
- Wastewater characterization Page 2.
- Site vicinity and topographic map.
- Site drainage and sampling location.
- Total suspended solids average.
- Temperature averages.
- Biochemical oxygen demand average.
- Oil and grease average.
- SIU Classification

APPENDIX C

Raw Material Usage By Line By Month
Year 2001

Month	Lbs. PP Line 1	Lbs. PET Line 1	Total Lbs. Line 1	Lbs. PP Line 2	Lbs. PE Line 2	Lbs. PET Line 2	Lbs. Nylon Line 2	Total Lbs. Line 2	Lbs. PP Line 3	Lbs. Total	MT Total
January	1,076,800	0	1,076,800	1,070,975	252,153	700	0	1,323,828	1,925,608	4,326,236	1962.01
February	984,556	0	984,556	1,045,340	326,085	-280	16,140	1,387,285	2,170,140	4,541,981	2059.86
March	1,278,961	0	1,278,961	866,868	488,700	-35	0	1,355,533	2,539,297	5,173,791	2346.39
April	1,077,112	0	1,077,112	1,161,203	258,000	-35	4,160	1,423,328	2,308,098	4,808,538	2180.74
May	544,952	2,030	546,982	1,282,739	34,535	0	0	1,317,274	2,317,565	4,181,821	1896.52
June	1,208,263	18,585	1,226,848	1,576,079	178,035	0	0	1,754,114	3,086,536	6,067,498	2751.70
July	500,240	140	500,380	799,872	156,748	0	0	956,620	2,252,266	3,709,266	1682.21
August	200,367	525	200,892	1,181,139	214,617	0	0	1,395,756	2,437,328	4,033,976	1829.47
September	744,856	3,885	748,741	1,630,010	2,310	0	0	1,632,320	3,100,203	5,481,264	2485.83
October	282,294	-280	282,014	1,203,515	231,215	0	0	1,434,730	2,260,882	3,977,626	1803.91
November	492,721	-455	492,266	1,187,350	199,820	0	1,800	1,388,970	2,403,064	4,284,300	1942.99
December	513,745	490	514,235	1,444,528	408,920	0	0	1,853,448	3,132,162	5,499,845	2494.26
YTD Total	8,904,867	24,920	8,929,787	14,449,618	2,751,138	350	22,100	17,223,206	29,933,149	56,086,142	25435.89

Total Lbs. Polypropylene (PP) YTD = 53,287,634
Total Lbs. Polyethylene (PE) YTD = 2,751,138
Total Lbs. Polyester (PET) YTD = 25,270
Total Lbs. Nylon YTD = 22,100

APPENDIX C

Miscellaneous Chemicals Stored on Site

Material	Solvent or Solvent Based Cleaner Y/N	Annual Quantity Used (gallons)	MSDS Provided Y/N
AW46 Hydraulic Oil	No		No
Big Bare Cleaner	Yes		Yes
Chemax 363	No		No
Delo 400 Oil	No		No
Dowtherm A Heat Transfer Oil	No		No
Dowtherm J Heat Transfer Oil	No		No
DTE 24 Oil	No		No
EP ISO 320 Grease	No		No
EP NLGI 1 Grease	No		No
EP NLGIO Grease	No		No
EP NLGIOO Grease	No		No
Flexon 815 Oil	No		No
GST ISO 32 Oil	No		No
Heat Transfer 46 Oil	No		No
Kerosene K1	No		No
Meropa 150 Oil	No		No
Meropa 460 Oil	No		No
Meropa 68 Oil	No		No
Nuwet 237	No		No
Pro Kool H.T. Fluid	No		No
Rando HD 32 Oil	No		No
Rando HD 68 Oil	No		No
RB Premium Grease	No		No
Regal R&O 150 Oil	No		No
Regal R&O 220 Oil	No		No
SCH 634 Oil	No		No
Silastol	No		No
SLS-S Sulfochem	No		No
State 999 Cleaner	Yes		Yes
Synthesin Z464	No		No
Tegra 220 Oil	No		No
Ultragear Lube	No		No
Vistac 68+ Oil	No		No
Zep Dyna 143 Cleaner	Yes		Yes
Zetesoft MC 10	No		No

APPENDIX C

Wastewater Characterization

Page 1

Permit Requirement	Analysis Date	Parameter	Analytical Result		Units
			Outfall 001	Outfall 002	
Monthly Analysis	1/8/01	Total oil and grease	ND		mg/L
Monthly Analysis	1/3/01 through 1/31/01	Temperature	Range of 11 to 14	Range of 14 to 25	°C
Monthly Analysis	2/7/01	Total oil and grease	ND		mg/L
Monthly Analysis	2/2/01 through 2/28/01	Temperature	Range of 10.7 to 16.9	Range of 14 to 25	°C
Monthly Analysis	3/2/01 through 3/30/01	Temperature	Range of 9.3 to 17	Range of 14.8 to 26.5	°C
Monthly Analysis	4/11/01	Total oil and grease	ND		mg/L
Monthly Analysis	4/3/01 through 4/29/01	Temperature	Range of 9.4 to 14.3	Range of 15 to 25	°C
Monthly Analysis	5/9/01	Total oil and grease	ND		mg/L
Monthly Analysis	5/3/01 through 5/30/01	Temperature	Range of 10 to 18.83 ⁽¹⁾	Range of 16.7 to 27.9	°C
Monthly Analysis	6/13/01	Total oil and grease	ND		mg/L
Monthly Analysis	6/2/01 through 6/30/01	Temperature	Range of 10.3 to 15.4	Range of 17.2 to 29.5	°C
Monthly Analysis	7/17/01	Total oil and grease	ND		mg/L
Monthly Analysis	7/2/01 through 7/30/01	Temperature	Range of 3.96 to 18.89 ⁽²⁾	Range of 15.4 to 28.3	°C
Monthly Analysis	8/9/01	Total oil and grease	ND		mg/L
Monthly Analysis	8/1/01 through 8/31/01	Temperature	Range of 9.66 to 22.86 ⁽³⁾	Range of 16 to 28.4	°C
Monthly Analysis	9/2/01 through 9/30/02	Temperature	Range of 5.84 to 24.03 ⁽⁴⁾	Range of 17.3 to 30.0	°C
Q-1, 2001 Quarterly Analysis	Quarterly 24 hour composite	Total Suspended solids		110	mg/L
	Quarterly 24 hour composite	Biochemical Oxygen Demand		60	mg/L
	Monthly Grab	Total oil and grease	<3	4	mg/L
	Continuous	Temperature	16.99	26.5	°C
	Weekly Grab	pH	7.52-8.25	6.8 - 7.03	SU
	Continuous	Flow	47,055	320,361	GPD

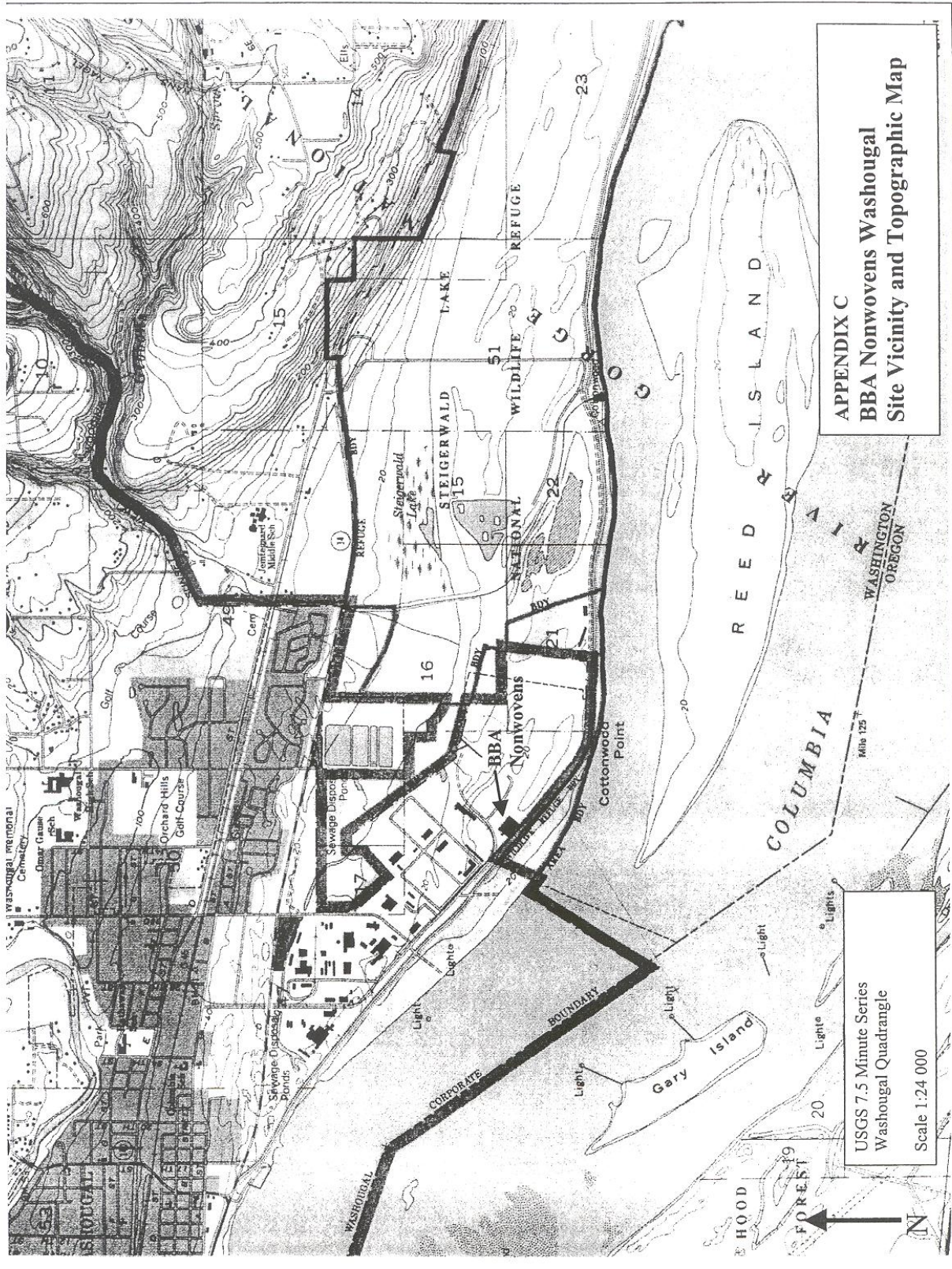
APPENDIX C

Wastewater Characterization

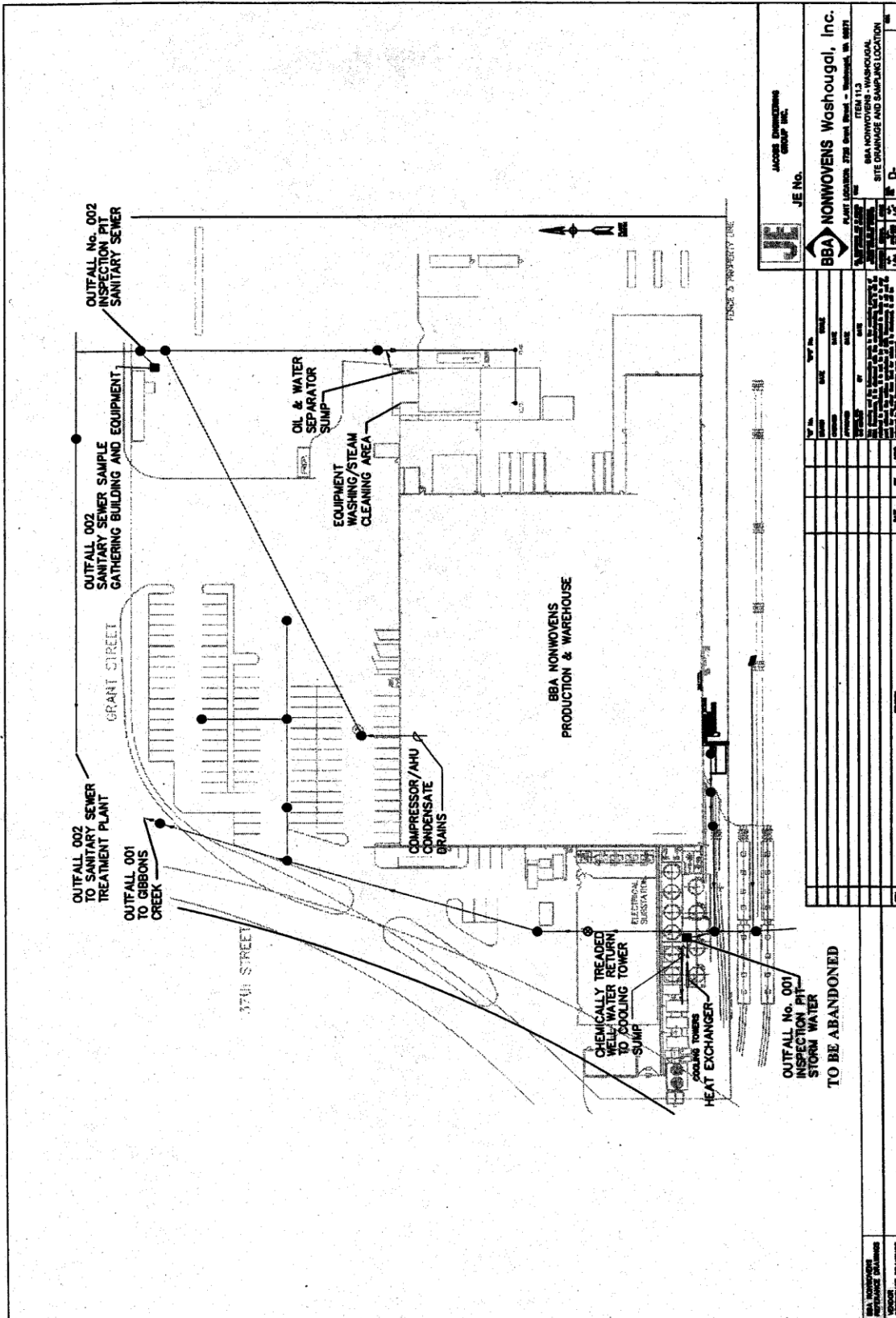
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Permit Requirement	Analysis Date	Parameter	Analytical Result		Units
			Outfall 001	Outfall 002	
Q-2, 2001 Quarterly Analysis	Quarterly 24 hour composite	Total Suspended solids		29	mg/L
	Quarterly 24 hour composite	Biochemical Oxygen Demand		46	mg/L
	Monthly Grab	Total oil and grease	<3	5	mg/L
	Continuous	Temperature	18.83	29.5	°C
	Weekly Grab	pH	7.47 - 8.07	6.48 - 7.33	SU
	Continuous	Flow	58,652	336,438	GPD
Q-3, 2001 Quarterly Analysis	Quarterly 24 hour composite	Total Suspended solids		25	mg/L
	Quarterly 24 hour composite	Biochemical Oxygen Demand		59	mg/L
	Monthly Grab	Total oil and grease	< 3	3	mg/L
	Continuous	Temperature	24.06	30	°C
	Weekly Grab	pH	8.26 - 8.4	6.52 - 7.13	SU
	Continuous	Flow	56,498	303,867	GPD
Q-4, 2001 Quarterly Analysis	Quarterly 24 hour composite	Total Suspended solids		18	mg/L
	Quarterly 24 hour composite	Biochemical Oxygen Demand		38	mg/L
	Monthly Grab	Total oil and grease	< 3	15	mg/L
	Continuous	Temperature	14.54	29.17	°C
	Weekly Grab	pH	8.05 - 8.48	6.51 - 7.3	SU
	Continuous	Flow	51,760	223,163	GPD

FACT SHEET FOR STATE WASTE DISCHARGE PERMIT NO. ST 6078
BBA Nonwovens, Inc.



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APPENDIX C

APPENDIX C
BBA Nonwovens
Total Suspended Solids Average

	Qtr. Ending	Total Suspended Solids
Outfall 002	3/31/02	150
	12/31/01	18.00
	9/30/01	25
	6/30/01	29
	3/30/01	110
	12/31/00	86
	9/30/00	1
	6/30/00	49
	3/30/00	7
Average		52.77778

APPENDIX C
BBA Nonwovens
Biochemical Oxygen Demand Average

	Qtr. Ending	BOD
Outfall 002	3/31/02	65
	12/31/01	38
	9/30/01	59
	6/30/01	46
	3/30/01	60
	12/31/00	60
	9/30/00	30
	6/30/00	230
	3/30/00	11
Average		66.55556

APPENDIX C
BBA Nonwovens
Temperature Averages

	<u>Qtr.</u> <u>Ending</u>	<u>Flow</u>	<u>Temp</u>	<u>C X D</u>
Outfall 001	3/31/02	57685	16.68	962185.8
	12/31/01	51760	14.54	752590.4
	9/30/01	56498	24.06	1359341.88
	6/30/01	58652	18.83	1104417.16
	3/30/01	47055	16.99	799464.45
	12/31/00	62036	19.41	1204118.76
	9/30/00	66244	19.22	1273209.68
	6/30/00	61961	15	929415
	3/30/00	49913	14.48	722740.24
Average		511804	159.21 17.79487	9107483.37
Outfall 002	3/31/02	191606	27.17	5205935.02
	12/31/01	223163	29.17	6509664.71
	9/30/01	303867	30	9116010
	6/30/01	336438	29.5	9924921
	3/30/01	320361	26.5	8489566.5
	12/31/00	187875	25.7	4828387.5
	9/30/00	180870	24.7	4467489
	6/30/00	206850	26.6	5502210
Total		1951030	219.34	54044183.73
Average			27.70033	
Overall Average		25.64187		

APPENDIX C
BBA Nonwovens
Oil and Grease Average

	<u>Qtr Ending</u>	<u>O & G</u>
Outfall 002	3/31/02	0
	12/31/01	15
	9/30/01	0
	6/30/01	5
	3/30/01	4
	12/31/00	12
	9/30/00	0
	6/30/00	4
	3/30/00	6
Average		5.111111

APPENDIX C
Significant Industrial User Classification
State Permit No. ST 6078

Wastewater flow used in determining classification;

Smoke Removal Scrubber Water	7300 GPD
Foam Generator Cooling Water	5220 GPD
Quench Air Unit Handling Drains	6805 GPD
Equipment Washing and Steam Cleaning Water	565 GPD
EREMA Pellet Drying Makeup Water	<u>14400</u> GPD
TOTAL	34290 GPD

Since this flow rate exceeds 25000 GPD, this is a Significant Industrial User.

*FACT SHEET FOR STATE WASTE DISCHARGE PERMIT NO. ST 6078
BBA Nonwovens, Inc.*

APPENDIX D—RESPONSE TO COMMENTS

No comments received.